

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION

ANDREW L. COLBORN,
Plaintiff

NETFLIX, INC.,
CHROME MEDIA, LLC, f/k/a
SYNTHESIS FILMS, LLC,
LAURA RICCIARDI, and
MOIRA DEMOS,

Case No. 19-CV-484

Defendants.

**MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT
PURSUANT TO FED.R.CIV.PRO. 15(a)**

Plaintiff, by and through his undersigned counsel and pursuant to Federal Rule of Civil Procedure 15(a), hereby respectfully moves the Court for leave to amend his pleadings and to file the proposed Second Amended Complaint attached as Exhibit 1. A comparison of the changes from the Amended Complaint is attached as Exhibit 2. This motion is further based on the supporting declaration of George Burnett filed this date together with all other pleadings and documents of record, and is further based on the argument contained in the brief filed this date, and particularly Section IV thereof.

Dated this 13th day of June, 2019.

LAW FIRM OF CONWAY, OLEJNICZAK & JERRY, S.C.
Attorneys for Plaintiff, Andrew L. Colborn

By: s/George Burnett
George Burnett

POST OFFICE ADDRESS:

231 S. Adams Street
Green Bay, WI 54301
P.O. Box 23200
Green Bay, WI 54305-3200
Phone: (920) 437-0476
Fax: (920) 437-2868
State Br No. 1005964

GRIESBACH LAW OFFICES, LLC
Attorney Michael C. Griesbach
State Bar No. 01012799
PO Box 2047
Manitowoc, WI 54221-2047
(920) 320-1358

SCHOTT, BUBLITZ & ENGEL, S.C.
Attorney April Rockstead Barker
State Bar No. 1026163
640 W. Moreland Blvd.
Waukesha, WI 53188-2433
(262)-827-1700

#3131722